

DATE FILED: 11/30/2015

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director

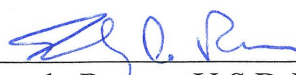
Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

November 30, 2015

Via Ecf

Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

The application is ☒ granted  
\_\_\_\_\_ denied

  
Edgardo Ramos, U.S.D.J.

Dated: 11/30/2015

New York, New York

Re: United States v. El Gammal  
15 Cr. 588 (ER)

Hon. Judge Ramos,

The December 1, 2015 conference is adjourned to December 11, 2015 at 2:30 PM. The time between these dates is hereby excluded under the Speedy Trial Act.

I write to request a 10-day adjournment of the December 1, 2015, date. Discovery was produced on a rolling basis and we need time to review it. Additionally, we plan to file a motion pursuant to 18 U.S.C. section 3142 for pretrial release. The government needs a week to respond.

To that end, we request that the time between December 1, 2015, and the next court date decided by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, as it will allow the parties counsel to continue discussions regarding a possible disposition in the matter.

Thank you for considering this request.

Respectfully submitted,

Sabrina P. Shroff  
Assistant Federal Defender

cc: AUSAs Surratt & Quigley (via email)